

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re)	Chapter 11
)	
CINEWORLD GROUP PLC., <u>et al.</u>,¹)	Case No. 22-90168 (MI)
)	(Joint Administration Requested)
Debtors.)	
)	

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS
AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned chapter 11 cases on behalf of creditors Benderson Development Company LLC; Blumenfeld Development Group Ltd.; Brookfield Properties Retail, Inc.; National Retail Properties, Inc.; Newmark Merrill Companies; Regency Centers Corporation; Realty Income Corporation; SITE Centers Corp.; and Teachers Insurance and Annuity Association of America (the “Landlords”). Pursuant to rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”), the Landlords request that the parties identified below be added to any Master Service List maintained in these cases and that all notices given or required to be given and all pleadings, motions, applications, and papers served or required to be served in these cases be delivered to and served upon the following parties:

¹ TBD

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile, or otherwise in this case.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of the Landlords including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Southern District of Texas (the “District Court”); (ii) the right to trial by jury in any proceeding related to these cases or any case, controversy, or proceeding related to these cases; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Landlords are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved. Unless and until the

Landlords expressly state otherwise, the Landlords do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: September 7, 2022
Location: Houston, Texas

KELLEY DRYE & WARREN LLP

/s/ Sean T. Wilson

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Counsel to Benderson Development Company LLC; Blumenfeld Development Group Ltd.; Brookfield Properties Retail, Inc.; National Retail Properties, Inc.; Newmark Merrill Companies; Regency Centers Corporation; Realty Income Corporation; SITE Centers Corp.; and Teachers Insurance and Annuity Association of America

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the September 7, 2022, a true and correct copy of the foregoing document was served via ECF notification on all parties entitled to ECF notification in this case.

/s/ Sean T. Wilson

Sean T. Wilson